

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

KAUFMAN DOLOWICH & VOLUCK, LLP

BY RICHARD J. PERR, ESQUIRE
MONICA M. LITTMAN, ESQUIRE
GRAEME E. HOGAN, ESQUIRE

Four Penn Center

1600 John F. Kennedy Blvd., Suite 1030

Philadelphia, PA 19103

Telephone: (215) 501-7002

Facsimile: (215) 405-2973

rperr@kdvlaw.com; mlittman@kdvlaw.com; ghogan@kdvlaw.com

Attorneys for Defendants CACH, LLC and Resurgent Capital Services, L.P.

LARA M. SANDERS, on behalf of herself	:	CIVIL ACTION
and all other similarly situated consumers	:	
Plaintiff	:	
v.	:	NO. 2:19-cv-00996- JXN-JSA
CACH, LLC and RESURGENT CAPITAL	:	
SERVICES, LP	:	
Defendants	:	

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that on December 6, 2021, Defendants CACH, LLC and Resurgent Capital Services, L.P. by and through their undersigned counsel, and pursuant to Federal Rule of Civil Procedure 56 shall move for summary judgment in their favor against Plaintiff Lara Sanders.

The grounds for this Motion are that there is no question of material fact that Defendants are entitled to judgment in their favor and against Plaintiff on the Fair

Debt Collection Practices Act and Fair Credit Report Act claims pled in Plaintiff's Amended Complaint (Doc. #21).

PLEASE TAKE FURTHER NOTICE that this Motion is based on Defendants' accompanying Statement of Material Facts and Memorandum of Law, all papers and pleadings on file, and on such further oral and documentary evidence that may be offered during further briefing on this Motion or at the Motion hearing.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

WHEREFORE, Defendants respectfully request that this Honorable Court grant judgment in their favor and against Plaintiff and for such other and further relief as this Honorable Court deems just.

Respectfully submitted,

KAUFMAN DOLOWICH & VOLUCK, LLP

BY: /s/ Monica M. Littman
RICHARD J. PERR, ESQUIRE
MONICA M. LITTMAN, ESQUIRE
GRAEME E. HOGAN, ESQUIRE
Four Penn Center
1600 John F. Kennedy Blvd., Suite 1030
Philadelphia, PA 19103
(215) 501-7024 (phone)
(215) 405-2973 (fax)
rperr@kdvlaw.com; mlittman@kdvlaw.com;
ghogan@kdvlaw.com

MESSER STRICKLER, LTD.

By: /s/ Katherine M. Saldanha Olson (Pro Hac Vice)
KATHERINE M. SALDANAH OLSON, ESQ.
225 W. Washington St., Ste. 575
Chicago, IL 60606
(v) 312-334-3444; (f) 312-334-3444
kolson@messerstrickler.com

Dated: November 12, 2021

*Attorneys for Defendants CACH, LLC and
Resurgent Capital Services, L.P.*

CERTIFICATE OF SERVICE

I, MONICA M. LITTMAN, ESQUIRE, hereby certify that on or about this date, I served a true and correct copy of the foregoing electronically via the Court's CM/ECF system on the following:

Lawrence Katz
Law Offices of Lawrence Katz
445 Central Avenue, Ste. 201
Cedarhurst, NY 11516
lawrencekatzone@gmail.com
Attorney for Plaintiff

/s/ Monica M. Littman
MONICA M. LITTMAN, ESQUIRE

Dated: November 12, 2021